

Issues of concern regarding the Rand Study for PTSD-

Commissioners Shelley Kessler, Christy Bouma and Nicholas Roxborough

Commissioner Shelley Kessler's Comments

1. Since it was noted that Assemblymember Daly requested answers to 12 research questions, it would assist us and the public to present the questions for review. They give context for the study and the results.
2. A total of only 13 firefighters and police officers were interviewed. Not only is this a tiny sample of the impacted individuals (with 30,000 firefighters in CA, for example) but the breadth and depth of what is considered to be First Responders is far more varied than the study acknowledges. Continuing the firefighter example: There are vast differences in exposure to traumatic events based on the types and volume of calls that firefighters respond to between rural and urban departments; in serving as firefighters versus firefighter-paramedics; in working on fire department ambulances as compared to engine and ladder companies; and from the experiences that accumulate over many years of service versus those of newly hired firefighters. The firefighter category alone is not sufficient to understand how these different situations affect PTSD.
3. In addition, no mention of the union leadership for any of the studied work groups were included in the list of those contacted. The people who represent these workers should have been contacted to not only share their experiences, but to allow contact within their ranks for the various types of scenarios their members sought to deal with their PTSD. The union leadership would likely have given RAND access to a much larger group of workers to interview. This would have made the results more credible.
4. Given that the study acknowledges that there is a lack of trust and confidence in EAP options, there is no citing of other concrete possibilities that might have been explored, except that those impacted likely paid for their own access to counseling of some sort. Again, this could have been captured by talking with worker representatives who assist their members as they navigate the EAP system for assistance and who might also have been able to find individuals within their ranks willing to share experiences.
5. We don't know how many of the other people listed were contacted from each category. If the numbers are either larger or smaller than those of the impacted workers, that may distort the results and therefore it would be important to know those numbers as well.
 - a. These are the people listed for whom we don't have specific numbers: – Applicants' attorneys, Department chiefs, Claim administrators, and Mental health providers
 - b. Note no contact to union or organizational representatives for the fire and police members.
6. Though acknowledged, the "hero stigma" that people in the first responder category face undermines their overt willingness to file claims for mental distress. Using data that is not only dated and less comprehensive does not help us understand what kinds of experiences trigger

distress post-incident among our state's firefighters, firefighter/paramedics and police officers. Citing that as a possibility, but not actually investigating this basic cultural issue among first responders, makes for a less than convincing study. But at least the study noted the difficulty.

7. There is acknowledgement that historically claims have been denied. Doesn't that also speak to why fewer claims are filed? If there is no trust in the system, it is far less likely that first responders would go through the effort to file and therefore they seek other alternative options. Speaking with more than 13 individuals would have helped deepen the study and would likely have raised other issues or concerns worth noting.
8. Really significant is the statement made by Rand that "Impacts of SB 542 not yet observable in data used for study." Clearly this states the obvious that more study is needed. But certainly, whoever does the study MUST speak to a greater number of directly impacted individuals and seek a deeper understanding of the diversity of experiences across the first responder category. The narrowly defined interview pool for such a significant issue must be expanded if relevant data is to be collected.
9. In the study's own words about important but unanswered matters: "Many Important Questions Could Not Be Addressed and Call for Further Research • Data on PTSD prevalence, incidence unavailable – Add questions to CHIS (PTSD Checklist) – Analyze restricted data files from federal surveys • Productivity, job retention benefits of mental health treatment for first responders is unknown – Quantify costs of productivity loss and turnover – Quantify benefits of earlier, more effective treatment • Ex post evidence on effects of SB 542 – Impacts on claim volumes, denials, and reversals – Actual costs to state and local government" These are fundamental questions that must be answered to understand the questions Rand was charged with investigating. Why weren't these questions pursued more vigorously by Rand? What was in the RFP that either prevented or could have allowed seeking answers to these issues?
10. In their summary, Rand stated that they also "Identified Challenges That May Call for Policy Solutions Beyond SB 542" which included, but is not limited to, "Direct care provision used by some departments to address these issues, but we don't know if this is cost effective or succeeds in helping first responders." So how would those issues be addressed or studied?
11. "Trauma-exposed occupations not covered by SB 542 may have worse mental health than first responders EMT/Ambulance, Security Guards, Corrections Officers". Odd that Rand doesn't know that EMT/Ambulance and paramedic ambulance workers are also under the Firefighter classification in many regions across California. Or that Security Officers and Correction Officers can also be included in the Peace Officer designation. To consider that these workers may have "worse mental health" than first responders is failing to see that these workers are, in fact, all first responders and in essence it pits these classifications against each other instead of seeing them all within the purposes of this study. Finally, missing these important facts about the work and experiences of first responders means that the study findings have incomplete relevance to the actual experience of our state's firefighters and police officers. For these reasons, I am very reluctant to accept the study findings, which could have large implications for California's first responders.

Commissioner Christy Bouma's Comments

1. Regarding item #9 in the comments – in addition to PTSD not being measured, suicide completion is not measured. The study also inferred, but did not expressly identify how the “hero stigma” influences a first responder’s admission of suicidal ideation, but rather simply concludes that the incidence of such ideation is not significant as measured against other groups. The concept is present, but could be more prominently stated.
2. The study identifies frequent denials and frequent reversals, but equally suggests that the data is not reliable to measure the scope of the problem and detail. How long is a first responder languishing in a denied status and how is that impacting cost to employers and additional trauma for the first responder? The failure of our data systems to capture detailed public sector trauma data remains a barrier to analysis of the system failures for California first responders.

(General comment - How is it that there could be a statutory requirement for a determination of compensability on or before 90 days, but no system of data captures the status of such a claim at 90 days?)

Lastly, to reflect on a helpful finding in the study. The study’s conclusion regarding the lack of access to culturally competent providers is alarming, but important to know. This is a significant finding that requires an urgent response from policy makers and the administration.

Commissioner Nicholas Roxborough's Comments

1. For a study to be of value there obviously must be a valid statistical basis for those who are interviewed. However, such appears to not be the case here where the 13 individuals were not randomly selected.
2. Nor would 13 of 30,000 employees, even if randomly selected, be deemed sufficient upon which to present the kind of information that apparently was being requested. Such is probably only valuable from an anecdotal standpoint.
3. I would therefore recommend that if there is to be a useful study conducted that there first be a valid statistical sample created from which meaningful information can then be drawn and recommendations made.